

Nuclear Fuel Services, Inc.
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Erwin, TN 37650
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

21G-08-0182
GOV-01-55-04
ACF-08-0356

November 13, 2008

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20857-2738

REFERENCE: **Docket No. 70-143; SNM License 124**

SUBJECT: **Delta Protection Mururoa BLU Respiratory Protection Suits**

Dear Sir:

Pursuant to the provisions of 10 CFR 20.1703, "Use of Individual Respiratory Protection Equipment," and 10 CFR 20.1705, "Application for Use of Higher Assigned Protection Factors," Nuclear Fuel Services, Inc. (NFS) requests authorization to use the French-designed Delta Protection Mururoa BLU respiratory protection suits described in "Topical Report for Delta Protection Mururoa BLU Suit Systems" (TR MURUBLU05NP).

NFS has identified the Delta Protection Mururoa BLU self-fed suits as having benefits in contamination control, heat stress reduction, and respiratory protection. Pursuant to 10 CFR 20.1703(b), NFS must request authorization for use of equipment that has not been tested or certified by NIOSH, or for which there is no schedule for testing or certification.

NFS commits to use the Delta Protection Mururoa BLU self-fed suits consistent with the Topical Report and within the device configuration, limitations and conditions of use stated in the Safety Evaluation dated April 10, 2006 (TAC NO. MC8994).

The Attachment to this letter lists NFS's commitments enabling use of the new system. Approval by March 31, 2009, will enable NFS to proceed with procedure changes and complete the necessary training for use of the BLU Suit in the second quarter of 2009.

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B. Marie Moore to NRC Document Control Desk
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If you or your staff have any questions, require additional information, or wish to discuss this, please contact Mr. Michael C. Tester, Radiological Control Senior Manager, at (423) 743-2518. Please reference our unique document identification number (21G-08-0182) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.

A handwritten signature in black ink, appearing to read "BM Moore".

B. Marie Moore
Vice President
Safety & Regulatory

GLG/rcy

Attachment

B. Marie Moore to NRC Document Control Desk
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Attachment to letter
dated November 13, 2008
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List of Commitments

(1 page to follow)

Attachment
LIST OF COMMITMENTS

The following table identifies the actions necessary to fulfill the commitments made in this letter to use the Delta Protection Mururoa BLU Suit System in accordance with the "Topical Report for Delta Protection Mururoa BLU Suit Systems (TR MURUBLU05NP) and to use the suits within the device configuration, limitations and conditions of use stated in the Safety Evaluation, dated April 10, 2006 (TAC No. MC8994).

| COMMITMENT | EXPECTED COMPLETION TIME |
|---|---------------------------------------|
| Establish procedures that implement the use of the BLU suits consistent with the Topical Report (ADAMS Accession No. ML053060280) and in accordance with the "configuration and conditions for use" identified in the NRC's related Safety Evaluation (ADAMS Accession No. ML060950499). | Prior to placing the suit in service. |
| Procedural guidance will be developed to ensure the BLU suits will be used in a configuration consisting of: Mururoa BLU one-piece encapsulating suit (of either PVC or Ethyfuse construction), fitted with a Micronel C500X-012EK-AB60 blower with a C501A-012AK-A battery (consistent with the parts list in Section 7 of Attachment 6.6.6 to the Topical Report (ADAMS Accession No. ML053060280) four Scott PF 10 P3, or four Delta Protection P3, high efficiency particulate filter cartridges. All four filter cartridges must be matching and replaced as a set. | Prior to placing the suit in service. |
| Procedures for use of the suit system are integrated into the respiratory programs required by Subpart H of 10 CFR Part 20. Fit testing of user is not applicable to fully encapsulating suits. Prior to use, wearers are trained on these conditions of use as well as the emergency escape features of the suits. | Prior to placing the suit in service. |
| Procedural guidance will be developed to ensure suit enclosures are single use only, (other than those segregated for training purposes only) and are discarded after use. Unused suit enclosures are stored in their original manufacturer's packing (in an environment not colder than 32 deg. F, nor hotter than 140 deg. F, during use, with a maximum storage shelf-life of 3 years. Suits are not to come in contact with anything colder than 41 deg. F nor hotter than 140 deg. F) with a maximum storage shelf life of 3 years. Suits are not to come into contact with anything colder than 41 deg. F nor hotter than 140 deg. F, during use. | Prior to placing the suit in service. |
| Procedural guidance will be developed to ensure communication channels are established with Delta Protection to report any defects experienced with the device, and ensure that any manufacturer's notifications concerning the suit systems are received in a timely manner. | Prior to placing the suit in service. |
| Procedural guidance will be established to ensure an oxygen content of at least 19.5 percent by volume and to prohibit the use of the suits in an Immediately Dangerous to Life and Health (IDLH) environment. | Prior to placing the suit in service. |
| Procedural guidance will be developed to ensure the suits are donned with a fully charged battery pack installed on the blower. The maximum period of use (timed from a fully charged battery), is 4 hours with the blower set at 600 l/min, and 7 hours with the blower at the 400 l/min setting. | Prior to placing the suit in service. |
| Procedural guidance will be developed to ensure the suits are used in accordance with recommendations in Attachments 6.6.4, 6.6.5, and 6.6.6 of the Topical Report (ADAMS Accession No. ML053060280). | Prior to placing the suit in service. |